

The Hon. Ricardo S. Martinez
Chief United States District Judge

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DANIEL RAMIREZ MEDINA,
Plaintiff,
v.
U.S. DEPARTMENT OF HOMELAND
SECURITY, *et al.*,
Defendants.

Case No. 2:17-cv-00218-RSM-JPD

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS TO RESPOND TO
PLAINTIFF'S THIRD AMENDED
COMPLAINT**

Noted for Consideration: June 4, 2019

Pursuant to LCR 10(g), Defendants U.S. Department of Homeland Security, *et al.*, and Plaintiff Daniel Ramirez Medina (together, “the Parties”), hereby stipulate to seek an order of the Court extending the time for Defendants to respond to Plaintiff’s Third Amended Complaint [ECF No. 140, filed May 30, 2019] by 4 weeks. Pursuant to Fed. R. Civ. P. 15(a)(3), Defendants’ current response deadline is June 12, 2019. Under the Parties’ stipulation, Defendants’ new response deadline would be July 10, 2019.

Good cause exists to extend Defendants’ deadline where counsel for Defendants’ were preparing for a hearing on May 31, 2019, which was ultimately canceled late in the day on May 30, and are presently preparing for a Ninth Circuit oral argument on June 13, 2019, in an appeal of the DACA-related case, *Inland Empire-Immigrant Youth Collective v. Duke*, 2017 WL 5900061 (C.D. Cal. Nov. 20, 2017). Counsel for Defendants have additional filing deadlines as

1 well as the upcoming July 4th holiday that further justify this requested 4-week extension to a
2 new response deadline of July 10, 2019.

3

4 It is so ordered, this ____ day of June, 2019.

5

6 _____
7 The Hon. Ricardo S. Martinez
8 Chief United States District Judge
9

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: June 4, 2019 Respectfully submitted,

CHAD A. READLER
Acting Assistant Attorney General

WILLIAM C. PEACHEY
Director

JEFFREY S. ROBINS
Deputy Director

/s/ James J. Walker
JAMES J. WALKER
Trial Attorney
U.S. Department of Justice
Civil Division
Office of Immigration Litigation
District Court Section
P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044
Phone: (202) 532-4468
Fax: (202) 305-7000
Email: james.walker3@usdoj.gov

Attorneys for Defendants

PUBLIC COUNSEL
MARK D. ROSENBAUM (CA SBN 59940),
pro hac vice
mrosenbaum@publiccounsel.org
JUDY LONDON (CA SBN 149431), *pro hac vice*
jlondon@publiccounsel.org
KATHRYN A. EIDMANN (CA SBN
268053), *pro hac vice*
keidmann@publiccounsel.org
610 South Ardmore Avenue
Los Angeles, CA 90005
Telephone: (213) 385-2977
Facsimile: (213) 385-9089

GIBSON, DUNN & CRUTCHER LLP
THEODORE J. BOUTROUS, JR. (CA SBN
132099), *pro hac vice*
tboutrous@gibsondunn.com
KATHERINE M. MARQUART (CA SBN
248043), *pro hac vice*
kmarquart@gibsondunn.com

/s/ Nathaniel L. Bach (with permission)
NATHANIEL L. BACH (CA SBN 246518),
pro hac vice
nbach@gibsondunn.com
333 South Grand Avenue
Los Angeles, CA 90071-3197

Stipulation to Extend Time
Case No. 2:17-cv-00218-RSM-JPD

U.S. Department of Justice, Civil Division
Office of Immigration Litigation
P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044
(202) 532-4468

Telephone: (213) 229-7000
Facsimile: (213) 229-7520

ETHAN D. DETTMER (CA SBN 196046),
pro hac vice
edettmer@gibsondunn.com
555 Mission Street
San Francisco, CA 94105
Telephone: (415) 393-8200
Facsimile: (415) 393-8306

ERWIN CHEMERINSKY (DC SBN 289330;
IL SBN 3122596), *pro hac vice*
echemerinsky@law.berkeley.edu
University of California, Berkeley School of
Law
**Affiliation for identification purposes only*
215 Boalt Hall
Berkeley, CA 94720-7200
Telephone: (510) 642-6483

Attorneys for Plaintiff

Stipulation to Extend Time
Case No. 2:17-cv-00218-RSM-JPD

U.S. Department of Justice, Civil Division
Office of Immigration Litigation
P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044
(202) 532-4468

1 **CERTIFICATE OF SERVICE**
2

3 I HEREBY CERTIFY that on June 4, 2019, I electronically filed the foregoing document
4 with the Clerk of the Court using CM/ECF. I also certify that the foregoing document should
5 automatically be served this day on all counsel of record *via* transmission of Notices of
6 Electronic Filing generated by CM/ECF.
7

8 _____
9 */s/ James J. Walker*
10 JAMES J. WALKER
11 Trial Attorney
12 U.S. Department of Justice
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28